

The Church of Scientology of Boston

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1/18/80

448 Beacon Street, Boston, Massachusetts 02115 Phone: (617) 266-9500, Telex: 94-0297



HAND DELIVERED

GENERAL COUNSEL
MASSACHUSETTS BAR OF OVERSEERS

January 15, 1980

RE: Michael J. Flynn, Esq.
1 Fanuiel Hall
Boston, Mass.

RECEIVED
OFFICE OF THE
BAR COUNSEL

JAN 16 1980

Dear Sir,

Please accept the following as an official complaint to the Massachusetts Bar Association concerning the conduct of one Michael Flynn in connection with the case of LaVenda Van Schaick vs The Church of Scientology of California, United States District Court for the District of Massachusetts, Docket Number 79-2491-G.

Based upon information received from individuals and other Churches Michael Flynn has embarked upon a hate-campaign calculated and announced to destroy all Churches of Scientology everywhere. His campaign centers around an entirely frivolous suit against various sister Churches of Scientology and individual Scientologists, in which Michael Flynn seeks to enjoin the practice of the religion of Scientology - an injunction no court could possibly grant so long as our American Constitution stands.

Specific acts complaint of, under the Code of Professional Responsibility follow:

1. INITIATION OF THE SUIT - Per DR 7-102 A) In his representation of a client a lawyer shall not 1. File Suit, assert a position, conduct a defense, delay a trial or take other action on behalf of his client when he knows or when it is obvious that such action would serve merely to harass or maliciously injure another. Prior to filing the suit, Michael Flynn met with Church counsel and made the following statements, "That the best way to destroy Scientology was financially" That the material he had was "explosive

L. RON HUBBARD - FOUNDER

Scientology is an applied religious philosophy. A non-profit organization in the U.S.A. registered in Massachusetts.
President-Robert E. Johnson, Jr. Vice-President-Joseph S. Francis Secretary-Mrs. Karen Rhena Treasurer-Maureen Hagles